

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JASON DOLLARHIDE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 22-cv-642-PRW
)	
DENNIS DICKENS, Oklahoma Highway Patrol, <i>et al.</i>,)	Judge Patrick R. Wyrick
)	
Defendants.)	

**RESPONSE TO PLAINTIFF’S MOTION TO FILE
FIRST AMENDED COMPLAINT BY DEFENDANTS
STATE OF OKLAHOMA AND DENNIS DICKENS**

For their response to Plaintiff’s Motion to File First Amended Complaint [Doc. 30], Defendants Dennis Dickens and State of Oklahoma state the following:

Defendants State of Oklahoma and Trooper Dennis Dickens do not object to Plaintiff filing his proposed First Amended Complaint with respect to the claims against them. Should Plaintiff elect to proceed with filing, Defendants State of Oklahoma and Dickens reserve their right to seek dismissal under Rule 12(b). By not objecting to the filing of the amended complaint at this juncture, neither the State nor Trooper Dickens intends to waive any substantive or procedural defenses they may have to Plaintiff’s claims, including but not limited to sovereign immunity, Eleventh Amendment immunity, and qualified immunity.

Respectfully submitted,

s/ Devan A. Pederson

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the attorneys of record who are ECF registrants.

s/ Devan A. Pederson

DEVAN A. PEDERSON